

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

In re: Gerald R. Galleshaw,
Debtor

BK No. 15-10047
Chapter 7

David C. Fraoli and
New England Auto Center, Inc.
Plaintiffs

v.

A.P. No. 15-01023

Gerald R. Galleshaw
Defendant

RESPONSE TO ORDER TO SHOW CAUSE

Now comes Defendant's Counsel, Todd S. Dion, who herein responds to the Court's December 16, 2015 Order to Show Cause as to why sanctions should not be imposed for said Counsel's failure to appear at a preliminary pre-trial conference on December 16, 2015, at 10:30 a.m.

Said Counsel herein states that he had to also be present at a Rhode Island District Court Trial in the matter of Wells Fargo Bank, N.A. v. Alphonso Zean, et al. C.A. No. 6CA-2015-10509, on December 16, 2015, at 9:00 a.m. and had intended to be present at said preliminary pre-trial conference, but was unable to attend due to the trial taking considerably longer than anticipated. Defendant's Counsel apologizes to the Court, and Plaintiffs' Counsel who were present, for his inability to attend on time.

Dated: December 16, 2015

Respectfully Submitted,

/s/ Todd S. Dion
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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2015, a copy of the foregoing document, filed through the CM/ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on the parties listed on the NEF as not receiving electronic notice.

/s/ Todd S. Dion
Todd S. Dion, Esq.